

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 23 CR 119
)	
CONOR BRIAN FITZPATRICK,)	Judge T.S. Ellis, III
)	
Defendant.)	
_____)	

UNOPPOSED MOTION TO MODIFY CONDITIONS OF RELEASE

Defendant Conor Brian Fitzpatrick, by and through his counsel Nina J. Ginsberg and Peter Katz, respectfully moves this Court without opposition for a modification of the terms of Mr. Fitzpatrick's release on bond.

Respectfully submitted,

/s/ Nina J. Ginsberg
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Declaration

Peter Katz declares as follows under 28 U.S.C. §1746:

1. I am counsel for Conor Fitzpatrick in this case. On March 23, 2023, Mr. Fitzpatrick appeared in Court and subject to certain conditions of his release, including travel restrictions to the Eastern and Southern Districts of New York, as well as the Eastern District of Virginia for court appearances. Doc 10.
2. On July 13, 2023, Mr. Fitzpatrick appeared before Your Honor and pled guilty to an Information. Your Honor continued the same travel restrictions. Doc. 38. The case was calendared for Sentencing on November 17, 2023.
3. In order to assist the Court at sentencing as well as helping the defendant with his on-going health, the Defendant has scheduled an evaluation with Dr. Jill Belchic, Ph.D. for August 22, 2023. Dr. Belchic's office is located in the Eastern District of Pennsylvania.
4. Mr. Fitzpatrick would be accompanied by his father for the trip from and to his home in the Southern District of New York. They plan on returning the same day.
5. I have contacted AUSA Lauren Halper and Trial Attorney Aarash Haghighat who advise me that the government does not oppose this application. A proposed order accompanies this motion.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 18, 2023

Respectfully submitted,

/s/ Peter Katz

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CERTIFICATE OF SERVICE

I certify that on August 18, 2023, a copy of the foregoing unopposed motion to modify conditions or release will be served on Assistant United States Attorney Lauren Halper and Trial Attorney Aarash Haghighat via electronic filing.

/s/ Nina J. Ginsberg